

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SINOX COMPANY LTD.

Plaintiff,

v.

YIFENG MANUFACTURING CO., LTD.,  
SHENZHEN YUANDAOYUAN  
INDUSTRIAL CO. LTD.

Defendants.

Case No. 6:21-cv-01022-ADA

Jury Trial Demanded

**PLAINTIFF'S NOTICE OF INTENT TO PROCEED WITH  
JURISDICTIONAL DISCOVERY**

Plaintiff Sinox Company Ltd. files this notice to inform all parties and the Court of its intent to proceed with jurisdictional discovery pursuant to the Court's April 14, 2022 Standing Order Governing Proceedings (OGP) 4.1—Patent Cases. On August 17, 2022, Defendant YiFeng Manufacturing Co. Ltd. filed a Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(2) for lack of personal jurisdiction (ECF No. 33).

Section V of the Court's OGP provides, "Venue or jurisdictional discovery automatically opens upon the filing of an initial venue or jurisdictional motion and shall be completed no later than 10 weeks after the filing of such motion. Parties shall file a notice of venue or jurisdictional discovery if the discovery will delay a response to a motion to transfer."

Further according to the Court's OGP, "The deadline for plaintiff's response is 2 weeks after the completion of venue or jurisdictional discovery. The deadline for Defendant's reply is 2 weeks after the filing of the response."

Accordingly, Sinox hereby provides notice of its intent to proceed with jurisdictional discovery, which will be completed no later than October 26, 2022, absent further order from this Court. Sinox further provides notice that it will file its response brief within two weeks of completing jurisdictional discovery, absent further order from this Court.

Dated: August 31, 2022

Respectfully submitted,

/s/ Joseph M. Abraham

Joseph M. Abraham

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*Attorneys for Plaintiff*

*Sinox Company Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Joseph M. Abraham  
Joseph M. Abraham